

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20580**

In the Matter of)

Amendment of Part 15 of the)
Commission's Rules to Reduce the)
Spectral Occupancy of Frequency)
Hopping Spread Spectrum Devices)
_____)

RM-8609

RECEIVED
489 1995
DOCKET FILE COPY ORIGINAL

**REPLY COMMENTS OF
SPECTRALINK CORPORATION, INC.**

SpectraLink Corporation ("SpectraLink"), by its undersigned counsel, hereby submits its Reply to the Comments filed on its Petition for Rulemaking ("Petition") to amend Section 15.247(a)(1)(i) and Section 15.247(b) of the Commission's Rules to reduce the spectral occupancy of frequency-hopping spread spectrum devices operating in the 902-928 MHz band.^{1/} The record demonstrates that commenters unanimously support granting SpectraLink's Petition. SpectraLink therefore urges the Commission, pursuant to Section 1.407 of the Commission's Rules, 47 C.F.R. § 1.407, to issue a final order adopting its proposed rule changes, or in the alternative, adopt a Notice of Proposed Rulemaking ("NPRM") on SpectraLink's proposed rule changes.^{2/}

^{1/} SpectraLink Corporation Petition for Rulemaking, RM 8609 (filed January 18, 1995).

^{2/} Any NPRM issued to consider SpectraLink's proposal should be separate from any action taken on the Petition for Rulemaking filed by Symbol Technologies, Inc. ("Symbol") (RM-8608) on December 6, 1994. In contrast to the unanimous support for SpectraLink's proposal, several commenters expressed reservations about certain aspects of Symbol's proposed rule changes. SpectraLink therefore believes that it would be in the public interest for the Commission to separate its consideration of the requested changes to Part 15 by SpectraLink and Symbol.

No. of Copies rec'd
List A B C D E

044

In its Petition, SpectraLink seeks to amend Part 15 of the Commission's Rules to reduce the spectral occupancy of spread spectrum devices in a manner that would avoid spectrum allocated exclusively to the highly sensitive AVM/LMS systems. By adopting SpectraLink's proposed rule changes, the Commission will ensure that a substantially higher percentage of deployed and new frequency-hopping devices will be able to co-exist in the 902 - 928 MHz band without interference. Commenters, likewise, recognize the significant public interest benefits of SpectraLink's proposal and unanimously support amending the Commission's Rules accordingly.

Itron, Inc. ("Itron") states that:

SpectraLink's proposal will provide flexibility to Part 15 manufacturers to design and deploy devices that require less spectrum. This, in turn, will facilitate coexistence of Part 15 devices and other services in the 902 - 928 MHz band.^{3/}

Symbol states that:

[SpectraLink's request] will greatly facilitate sharing of the 902 - 928 MHz band between spread spectrum users under Part 15 and the newly authorized Location and Monitoring Service, while minimizing the likelihood of service interruptions or degradation of service to spread spectrum applications.^{4/}

Apple Computer, Inc. ("Apple") states that SpectraLink's request "should be welcomed both by suppliers of Part 15 devices and by LMS licensees" and that it "should be expeditiously granted."^{5/} As these comments clearly demonstrate, SpectraLink's proposed rule changes are in the public interest and significant benefits would be derived from amending Part 15 of the

^{3/} Itron Comments at 2.

^{4/} Symbol Comments at 2.

^{5/} Apple Comments at 2 - 3.

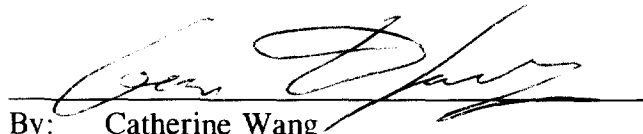
Commission's Rules as proposed by SpectraLink. The Commission should therefore issue a final order adopting SpectraLink's proposed rule changes.

In the alternative, given that commenters support SpectraLink's Petition but have certain reservations about Symbol's Petition for Rulemaking, SpectraLink urges the Commission to bifurcate its consideration of the rule changes proposed by SpectraLink and Symbol and adopt a separate NPRM to implement SpectraLink's proposal to reduce the spectral occupancy of frequency-hopping spread spectrum devices operating in the 902-928 MHz band. Otherwise, if the Commission were to consider the suggested rule changes by SpectraLink and Symbol in the same NPRM proceeding, the significant public interest benefits of SpectraLink's proposal would be delayed. Such delay would adversely affect the deployment of frequency-hopping technology for no useful regulatory purpose.

SpectraLink therefore urges the Commission to issue a final order adopting its proposed rule changes, or in the alternative, adopt a NPRM on its proposed rule changes separate from any action taken on the Petition for Rulemaking filed by Symbol.

Respectfully Submitted,

SPECTRALINK CORPORATION, INC.

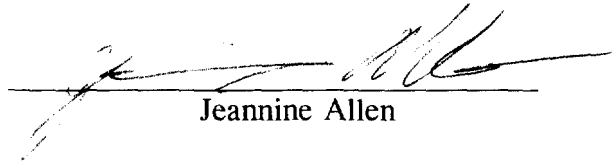

By: Catherine Wang
Gene DeJordy
SWIDLER & BERLIN, CHARTERED
3000 K Street, N.W., Suite 300
Washington, DC 20007-5116
(202) 424-7500

Counsel for **SpectraLink Corporation, Inc.**

Dated: April 24, 1995

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of April, 1995, copies of **Reply Comments of SpectraLink Corporation, Inc., RM 8609**, were served by hand delivery on all parties on the attached service list.


Jeannine Allen

Mr. Bruce A. Franca
Office of Engineering and Technology
Federal Communications Commission
2000 M Street, N.W., Room 480
Washington, D.C. 20554

Mr. John A. Reed
Office of Engineering and Technology
Federal Communications Commission
2000 M Street, N.W., Room 480
Washington, D.C. 20554

Mr. Richard B. Engleman
Office of Engineering and Technology
Federal Communications Commission
2000 M Street, N.W., Room 480
Washington, D.C. 20554

Michael J. Marcus, Esquire
Office of Engineering and Technology
Federal Communications Commission
2000 M Street, N.W., Room 480
Washington, D.C. 20554

Ms. Karen E. Watson, Director
Office of Public Affairs
Federal Communications Commission
1919 M Street, N.W., Room 202
Washington, D.C. 20554

International Transcription Services, Inc.
2100 M Street, N.W., Suite 140
Washington, D.C. 20037

Gerald P. McCartin, Esq.*
Mitchell Lazarus, Esq.
Counsel for Symbol Technologies, Inc.
Arent Fox Kintner Plotkin & Kahn
1050 Connecticut Avenue, N.W.
Washington, D.C. 20036-5339

Henrietta Wright, Esq.*
W. Kenneth Ferree, Esq.
Counsel for Itron, Inc.
Goldberg, Godles, Wiener & Wright
1229 19th Street, N.W.
Washington, D.C. 20036